

April 28, 2005

Mr. Daniel J. Malone
Site Vice President
Palisades Nuclear Plant
Nuclear Management Company, LLC
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR POWER PLANT - CLARIFICATION OF INSERVICE TESTING INTERVAL FOR CERTAIN RELIEF VALVES - RELIEF REQUESTS 28, 30, AND 31 (TAC NO. MC6550)

Dear Mr. Malone:

By letter dated March 23, 2005, Nuclear Management Company, LLC (NMC, the licensee) requested clarification of statements made by the U.S. Nuclear Regulatory Commission (NRC) in its safety evaluation (SE) for valve relief requests VRR-28, VRR-30, and VRR-31. [Reference: NRC's March 6, 1998, letter to Consumers Energy, the previous licensee, "Staff Review of Requests for Relief from Certain Pump and Valve Inservice Testing Requirements at the Palisades Plant (TAC NOS. M98923, M98924, M99344, and M99650)."] The requested clarification relates to the extension of the licensee's Inservice Testing (IST) Program interval as allowed by the American Society of Mechanical Engineers (ASME) Code.

IWA-2430(e) states that "for power units that are out of service continuously for 6 months or more, the inspection interval during which the outage occurred may be extended for a period equivalent to the outage and the original pattern of intervals extended accordingly for successive intervals."

The Code also requires that Class 1 pressure relief valves be tested at least once every 5 years, and that a minimum of 20 percent of the valves from each valve group shall be tested within any 24-month interval. The Code requires that Class 2 and 3 pressure relief valves be tested at least once every 10 years, and that a minimum of 20 percent of the valves from each valve group shall be tested within any 48-month interval.

Relief Request VRR-30 pertains to relief valve RV-0401, a Class 1 valve in the shutdown cooling system. Because it is a one valve group, the Code would require that this valve be tested every 24 months. The licensee requested and was authorized to test this valve at least once every 10 years during full core off-loads unless testing has been performed in the previous 24 months.

Relief Request VRR-28 pertains to relief valves RV-0402, RV-0403, RV-0954, RV-0955 and RV-2109. These Class 2/3 relief valves are in the component cooling system, engineering safeguards system, and spent fuel pool cooling system. They are designed to protect the shutdown cooling heat exchangers, and the spent fuel pool cooling heat exchangers from

thermal expansion of water when the heat exchangers are isolated for maintenance or inspection. Because there are five valves in this group, the Code would require, for example, that one valve from this group be tested every 2 years. The licensee requested and was authorized to test these valves when the associated heat exchanger is isolated for maintenance or inspection unless they have been tested within the last 48 months. The SE authorizing this alternative also states:

If a full core off-load or an alternate means of cooling the spent fuel pool is not feasible to accommodate the appropriate interval, some other method of assuring operational readiness must be provided, such as enhanced quality assurance and preventive maintenance. The use of other methods would require review and approval by the NRC staff prior to implementation.

Relief Request VRR-31 pertains to relief valves RV-3162 and RV-3164, Class 2 valves in the discharge header and supply line for the shutdown cooling system. Because it is a two-valve group, the Code would require that one of these valves be tested every 48 months. The licensee requested and was authorized to test these valves at least once every 10 years during full core off-loads when testing has not been performed in the previous 48 months. The SE authorizing this alternative has the same caveat as did the SE for VRR-28.

NMC has extended the Palisades Nuclear Power Plant (Palisades) IST Program, third 10-year testing interval from August 21, 2005, to March 24, 2006, in accordance with the ASME Code, Section XI, 1989 Edition, Subsection IWA-2430(e). This extension recaptures the 215-day extended outage the licensee experienced in 2001, to repair their control rod drive mechanisms. The licensee, in their March 23, 2005, letter, requests clarification as to whether the extension for the specified relief valves is acceptable given the very specific language used in the NRC staff's SE (i.e., the SE specifies "10 years" as opposed to more generally referring to a 10-year interval).

The NRC staff notes that there is a difference between a 10-year IST Program Interval and a component's test interval (e.g., quarterly, once each refueling outage, 5 years, 10 years). While the Code allows a licensee to extend its IST Program interval based on an extended outage, it does not offer that same flexibility to the test intervals.

Therefore, revised alternatives need to be authorized to extend the test interval beyond that specified in the NRC staff's March 6, 1998, SE. However, the specific "10 year" words in the NRC's March 6, 1998, SE were not meant to remove any Inservice Inspection/IST Program 10-year interval extension flexibility permitted by the ASME Code.

D. Malone

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The inference from reading the licensee's relief requests VRR-28, VRR-30, and VRR-31, and most recent letters (dated March 23, and March 31, 2005), is that full core off-loads are only performed at Palisades once every 10 or more years. The NRC staff will consider the licensee's request to extend the test intervals for valves in relief requests VRR-28, VRR-30, and VRR-31, on a one time basis, until the next scheduled full core off-load, i.e., fall 2007, in the NRC's response to your March 31, 2005, letter (TAC MC6545). For future IST Program 10-year intervals, the NRC staff is considering requiring that these valves be tested every full core off-load unless they have been tested in the previous 24 or 48 months as applicable.

If you have any questions regarding this issue, please contact Mr. David H. Jaffe at 301-415-1439 or by e-mail at dhj@nrc.gov.

Sincerely,

/RA/

L. Raghavan, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

cc: See next page

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If you have any questions regarding this issue, please contact Mr. David H. Jaffe at 301-415-1439 or by e-mail at dhj@nrc.gov.

Sincerely,

/RA/

L. Raghavan, Chief, Section 1
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Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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